

**EXHIBIT A**

**Proposed Order**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

	)	
In re:	)	Chapter 7
	)	
TEAM SYSTEMS INTERNATIONAL, LLC,	)	Case No. 22-10066 (CTG)
	)	
Debtor.	)	
	)	

**ORDER GRANTING MOTION OF CHAPTER 7 TRUSTEE FOR AN ORDER, PURSUANT  
TO SECTION 105(a) OF THE BANKRUPTCY CODE, BANKRUPTCY RULE 2004, AND  
LOCAL BANKRUPTCY RULE 2004-1, AUTHORIZING AND DIRECTING THE  
EXAMINATION OF VARIOUS ENTITIES**

Upon the motion of George L. Miller, as the Chapter 7 Trustee (“Trustee”) of Team Systems International, LLC (the “Debtor”), pursuant to section 105(a) of the Bankruptcy Code, Rule 2004 of the Federal Rules of Bankruptcy Procedure, and Local Rule 2004-1 of the United States Bankruptcy Court for the District of Delaware, seeking the entry of an order directing the examination of various entities (the “Motion”);<sup>1</sup> upon consideration of the Motion; and due and proper notice of the Motion having been given, it is hereby

ORDERED that the Motion is granted; and it is further

ORDERED that the Trustee is authorized to issue subpoenas to (i) TSI Gulf Coast, LLC, (ii) Randall L. Leshin, P.A., (iii) Tunnell & Raysor, P.A., (iv) TD Bank, N.A., (v) Artisan’s Bank, (vi) Luis A. Ayala Colón Sucrs., Inc., (vii) National Financial Services, Inc., National Life Group, National Life Insurance Company, and Equity Services Inc. (collectively, the “National Life Entities”), (viii) Coffelt Land Title, Inc.; (ix) McBee Custom Homes, (x) Addy Road LLC, (xi) Southern Title Holding Company, LLC, and (xii) Lindsay Blee Americas LLC (collectively, the “2004 Examinees”) for the production of documents, electronically stored information, or

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<sup>1</sup> Capitalized terms not otherwise defined in this Order shall have the meaning given to them in the Motion.

tangible things responsive to requests relating to the Examination Topics described in the Motion;  
and it is further

ORDERED that the Rule 2004 Parties shall produce documents in accordance with this Order on or before a date that is fifteen (15) days from the service of such subpoenas unless otherwise ordered by the Court; and it is further

ORDERED that, following the production of documents, to the extent the Trustee has questions regarding such documents, the Trustee may issue a subpoena on the 2004 Examinees seeking oral testimony; and it is further

ORDERED that, following a good faith effort to meet and confer, any motions to quash or otherwise modify such subpoenas may be filed in this Court as the court for the district where compliance is required; and it is further

ORDERED that the Court shall retain jurisdiction with respect to any matters, claims, rights or disputes arising from or related to the implementation of this Order.